

EXHIBIT G

Susana M. Ricardo

From: Aamir Kazi
Sent: Friday, September 03, 2021 11:09 PM
To: Corby Vowell; Susana M. Ricardo; Jon Suder; Mike Cooke; Rich Wojcio; bfarnan@farnanlaw.com; Christopher O. Green; Susan Morrison; Michael J. Farnan
Cc: McAfee/Kajeet
Subject: RE: Kajeet v. McAfee - Service of Discovery

Hi Corby –

Thanks for your email. We would like to clarify a few points. McAfee plans on producing documents as soon as possible. We do not know right now if that will be in the next 4-6 weeks, sooner, or later. We also do not know if that will be the “bulk” of McAfee’s production. But in any event, McAfee is already in the process of preparing documents for production, and expects to have a sizeable production in the next several weeks.

Separately, with regards to McAfee’s response to Interrogatory No. 1, McAfee has provided a narrative response that explains one or more of its noninfringement arguments and has separately identified documentary support. We are not aware of any requirement for McAfee to provide source code citations in addition – particularly given the inadequacies of Kajeet’s infringement contentions. Nonetheless, I explained that McAfee would consider supplementing its interrogatory response with source code citations if Kajeet supplements its infringement contentions with source code citations. We understand that Kajeet is refusing to do so at this time.

Thank you.

Aamir Kazi :: Principal :: Fish & Richardson P.C.
404 724 2811 direct :: kazi@fr.com

From: Corby Vowell <vowell@fsclaw.com>
Sent: Wednesday, September 01, 2021 6:58 PM
To: Aamir Kazi <kazi@fr.com>; Susana M. Ricardo <Ricardo@fr.com>; Jon Suder <jts@fsclaw.com>; Mike Cooke <mtc@fsclaw.com>; Rich Wojcio <wojcio@fsclaw.com>; bfarnan@farnanlaw.com; Christopher O. Green <cgreen@fr.com>; Susan Morrison <morrison@fr.com>; Michael J. Farnan <mfarnan@farnanlaw.com>
Cc: McAfee/Kajeet <McAfee/Kajeet@fr.com>
Subject: RE: Kajeet v. McAfee - Service of Discovery

Aamir,
In our meet and confer yesterday, August 31, 2021, we discussed the scope of the Requests for Production Nos. 6-8-17-18, 29, 32, 40, and 47 to clarify for McAfee the categories of documents that Kajeet is seeking. You indicated that, based on the clarifications, you would go back and request responsive documents from McAfee.

We also discussed the timing of McAfee’s production of documents for the other requests which McAfee indicated it would produce documents. You stated that McAfee would not be producing responsive documents this week or next week and that the bulk of McAfee’s production would likely be made in approximately 4-6 weeks.

In addition, we discussed McAfee's response to Kajeet's Interrogatory No. 1 related to its non-infringement positions and Kajeet's position that McAfee needed to identify specific portions of the source code that are relevant to Interrogatory No. 1. You stated that McAfee would not identify any specific portions of the code.

We look forward to receiving McAfee's document production.

Thanks,
Corby

From: Aamir Kazi <kazi@fr.com>

Sent: Friday, August 27, 2021 3:07 PM

To: Corby Vowell <vowell@fsclaw.com>; Susana M. Ricardo <Ricardo@fr.com>; Jon Suder <jts@fsclaw.com>; Mike Cooke <mtc@fsclaw.com>; Rich Wojcio <wojcio@fsclaw.com>; bfarnan@farnanlaw.com; Christopher O. Green <cgreen@fr.com>; Susan Morrison <morrison@fr.com>; Michael J. Farnan <mfarnan@farnanlaw.com>

Cc: McAfee/Kajeet <McAfee/Kajeet@fr.com>

Subject: RE: Kajeet v. McAfee - Service of Discovery

Corby –

We are available Tuesday at 10 AM to 12 PM ET.

With respect to McAfee's documents, we are in the process of collecting documents and preparing them for production. McAfee indicated as much in its response to Kajeet's RFP. Your statement that McAfee only produced 22 pages of core technical documents is of course not true, as McAfee made its source code available for inspection, which Kajeet finally inspected this week.

Best,

Aamir Kazi :: Principal :: Fish & Richardson P.C.

404 724 2811 direct :: kazi@fr.com

From: Corby Vowell <vowell@fsclaw.com>

Sent: Friday, August 27, 2021 11:30 AM

To: Aamir Kazi <kazi@fr.com>; Susana M. Ricardo <Ricardo@fr.com>; Jon Suder <jts@fsclaw.com>; Mike Cooke <mtc@fsclaw.com>; Rich Wojcio <wojcio@fsclaw.com>; bfarnan@farnanlaw.com; Christopher O. Green <cgreen@fr.com>; Susan Morrison <morrison@fr.com>; Michael J. Farnan <mfarnan@farnanlaw.com>

Cc: McAfee/Kajeet <McAfee/Kajeet@fr.com>

Subject: RE: Kajeet v. McAfee - Service of Discovery

Aamir,

Please provide times that you are available on Tuesday of next week (August 31) for the meet and confer.

In addition, we did not receive any document production from McAfee yesterday which should have accompanied its discovery responses. Please let me know today if and when McAfee intends to produce documents for the other categories of documents that McAfee stated in its responses that it will produce. This is particularly important in light of the fact that McAfee only produced 22 pages of documents as its "core technical documents" in this case and then refused to produce further documents.

Thanks,
Corby

From: Aamir Kazi <kazi@fr.com>
Sent: Friday, August 27, 2021 10:11 AM
To: Corby Vowell <vowell@fsclaw.com>; Susana M. Ricardo <Ricardo@fr.com>; Jon Suder <jts@fsclaw.com>; Mike Cooke <mtc@fsclaw.com>; Rich Wojcio <wojcio@fsclaw.com>; bfarnan@farnanlaw.com; Christopher O. Green <cgreen@fr.com>; Susan Morrison <morrison@fr.com>; Michael J. Farnan <mfarnan@farnanlaw.com>
Cc: McAfee/Kajeet <McAfee/Kajeet@fr.com>
Subject: RE: Kajeet v. McAfee - Service of Discovery

Corby –

We are not available to meet and confer today. We can discuss on Tuesday or Thursday of next week. Please let us know if Kajeet has a preference.

Thank you.

Aamir Kazi :: Principal :: Fish & Richardson P.C.

404 724 2811 direct :: kazi@fr.com

From: Corby Vowell <vowell@fsclaw.com>
Sent: Thursday, August 26, 2021 6:35 PM
To: Susana M. Ricardo <Ricardo@fr.com>; Jon Suder <jts@fsclaw.com>; Mike Cooke <mtc@fsclaw.com>; Rich Wojcio <wojcio@fsclaw.com>; bfarnan@farnanlaw.com; Aamir Kazi <kazi@fr.com>; Christopher O. Green <cgreen@fr.com>; Susan Morrison <morrison@fr.com>; Michael J. Farnan <mfarnan@farnanlaw.com>
Cc: McAfee/Kajeet <McAfee/Kajeet@fr.com>
Subject: RE: Kajeet v. McAfee - Service of Discovery

[This email originated outside of F&R.]

Aamir,

In McAfee's responses to Kajeet's Requests for Production Nos. 6-8-17-18, 29, 32, 40, and 47, you did not state whether McAfee would produce responsive documents. Instead, you stated for each of these requests that "McAfee is willing to meet and confer regarding the scope of this request." Please provide a time for tomorrow August 27, 2021 at which you are available to meet and confer regarding these requests.

In addition, in response to Kajeet's Interrogatory No. 1 related to McAfee's non-infringement positions, McAfee responded, in part, based on Rule 33(d) that "further details" regarding its positions can be found in McAfee's source code. However, McAfee did not specify the portions of the source code relevant to its interrogatory response. Please be prepared to discuss this issue on our meet and confer tomorrow as well.

Thanks,
Corby

From: Susana M. Ricardo <Ricardo@fr.com>
Sent: Thursday, August 26, 2021 2:01 PM
To: Corby Vowell <vowell@fsclaw.com>; Jon Suder <jts@fsclaw.com>; Mike Cooke <mtc@fsclaw.com>; Rich Wojcio <wojcio@fsclaw.com>; bfarnan@farnanlaw.com
Cc: McAfee/Kajeet <McAfee/Kajeet@fr.com>
Subject: Kajeet v. McAfee - Service of Discovery

Counsel:

Attached please find for service:

- **DEFENDANT MCAFEE CORP.'S OBJECTIONS AND RESPONSES TO PLAINTIFF KAJEET, INC.'S FIRST SET OF REQUESTS FOR PRODUCTION FOR DOCUMENTS AND THINGS (NOS. 1-48) AND**
- **DEFENDANT MCAFEE CORP.'S OBJECTIONS AND RESPONSES TO PLAINTIFF KAJEET, INC.'S FIRST SET OF INTERROGATORIES (NOS. 1-8)**

Thank you,

Susana M. Ricardo :: Legal Secretary :: Fish & Richardson P.C.
404 724 2827 direct :: ricardo@fr.com
fr.com :: [Bio](#) :: [LinkedIn](#) :: [Twitter](#)

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